To: Lidgard, Michael[Lidgard.Michael@epa.gov]; Seyfried, Erin[Seyfried.Erin@epa.gov]

Cc: Soderlund, Dianne[Soderlund.Dianne@epa.gov]; Mayers, Timothy[Mayers.Timothy@epa.gov]

From: Shaw, Hanh

**Sent:** Thur 6/11/2015 8:05:04 PM

Subject: ROV-MLC

I just had a short conversation with Greg Horner about Shell's plans to submit an NOI package to EPA requesting authorization to discharge muds and cuttings under the Chukchi GP from construction of a mudline cellar (MLC) using a remote-operated vehicle (ROV). Shell would like to utilize the ROV technology, deployed from a vessel, to construct the MLC during the 2016 drilling season.

Several issues and concerns come to mind that we will need to address:
Non-Responsive
2. Shell used a different model to evaluate the depositional impacts from the increased volumes of cuttings associated with the ROV-MLC. We have requested a model license and continue to work with Shell to independently verify their modeling work.
Non-Responsive

More to come on these issues, but I wanted to let you know Shell is moving forward with planning for the 2016 drill season. They intend to submit NOI application packages to EPA for the ROV-MLC in early July.

Hanh Shaw

Program Manager

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